

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

PRAGMATUS AV, LLC,)	CASE NO. No. 2:10-cv-00560-
)	HCM/FBS
Plaintiff)	
)	
v.)	
)	
FACEBOOK, INC., ,)	
)	
Defendants.)	

**DECLARATION OF JEANNIE FARREN IN SUPPORT OF FACEBOOK’S MOTION
TO TRANSFER VENUE UNDER 28 U.S.C. § 1404(a)**

I, JEANNIE FARREN, declare as follows:

1. I am employed by Defendant Facebook, Inc. (“Facebook”) as a Paralegal Manager. I make this declaration in support of Defendant Facebook’s Motion to Transfer Venue Under 28 U.S.C. § 1404(a). I have personal knowledge of the facts contained within this declaration, and if called as a witness, could testify competently to the matters contained herein.

2. Facebook is a Delaware corporation with its principal place of business in Palo Alto, California, within the Northern District of California. Facebook has maintained its principal place of business in Palo Alto, California since 2004.

3. I understand that, in the above captioned litigation, Pragmatus AV, LLC has accused unidentified Facebook “systems” and “methods” of infringement “including through Facebook Chat.” Although I cannot specifically identify the systems and services Pragmatus intends to accuse, the vast majority of employees with knowledge of the development, implementation, and operation of Facebook’s service offerings, including Facebook Chat, are located at Facebook’s Palo Alto headquarters. The vast majority of documents related to Facebook’s service offerings are also located at Facebook’s Palo Alto headquarters.

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4. Although Facebook has servers located in Virginia, Facebook does not maintain an office or have technical employees located in Virginia.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 20 2011 Signed: 